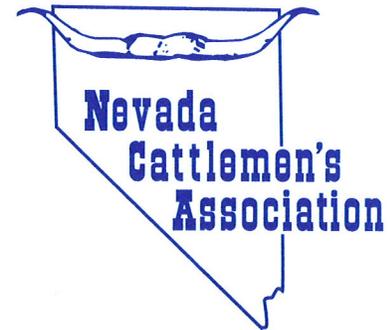


September 11, 2009

Solar Energy EIS
Argonne National Laboratory
9700 South Cass Avenue - ENV/900
Argonne, Illinois 60439



Re: Comments Regarding the Solar Programmatic Environmental Impact Study (Solar PEIS)

Good Day:

The Nevada Cattlemen's Association (NCA) is a non-profit organization representing Nevada livestock producers. We strive to protect the future of agriculture for our industry and our rural communities. Our membership includes cattle & sheep operations, agricultural businesses and folks interested in agriculture, open spaces and rural family living.

The state of Nevada is unique, i.e., over 88% of our lands are considered "public lands" and are managed by the Bureau of Land Management (BLM). Our public lands are managed under the multiple use concept. In addition to ranching & mining, our public lands are used and enjoyed by: sportsmen, wildlife & wildlife habitat advocates, OHV users and a multitude of other outdoor enthusiasts.

As proposed, the development of solar powered utility plants within the Solar Development Analysis Area or specific Solar Energy Study Areas (Delamar Valley, Dry Lake Valley North, and East Mormon Mountain) will result in serious impacts to the public lands grazing permittees and other current public lands users.

Since the 1850's, grazing livestock on public lands has been an essential part of Nevada ranching operations and our rural culture. The ranching industry is an integral part of the well being of Nevada's public lands and surrounding rural communities.

Nevada Cattlemen's Association supports the Solar Energy Study Areas approved by the Lincoln County Commission. The board's decision was based on input of affected public lands grazing permittees and other public lands users.

Recognizing that many potential impacts may occur within proposed project areas, the Nevada Cattlemen's Association supports the requiring a Preliminary Environmental Impact Statement (PEIS). These include potential AUM's loss, impacts to native vegetation, invasive weeds, and public land access. The NCA believes it is imperative that the PEIS contain a commitment to a "no net loss" of AUM's on grazing allotments where solar facilities are developed.

Range improvements are critical to grazing operations on public lands. These improvements include seedings, fencing, gates, cattle guards, corrals, chutes, wells, reservoirs, pipelines, tanks, troughs, and roads. In order to maintain a viable ranching operation, all range improvements within the project area must be identified and mitigated; therefore the permittee should be included in discussion involving any livestock improvements. If range improvements *will* be impacted, a mitigation plan should be developed with the input of the BLM and permittees.

Along with AUM's, ecosystem health, and range improvements, public land access is also an important aspect of your evaluation in the PEIS. Open access to public lands is essential to maintaining multiple use principals. We feel it is important that the PEIS identify all public lands access routes within or adjacent to the project areas. Any impacted access areas should be mitigated in order to ensure no loss of access to currently accessible public lands.

The association feels that the process used to approve the site-specific developments is unclear, and would like to have the process and means by which affected parties can provide input during that process be explained.

Thank you for the opportunity to comment on this most important issue. If you have questions regarding any of the topics or concerns raised in this letter please feel free to contact the association office at 1-775-738-9214 or via email nca@nevadabeef.org.

Best Regards,



Dan Grafian
President, Nevada Cattlemen's Association

CC: Governor Jim Gibbons
Senator Harry Reid
Senator John Ensign
Congressman Dean Heller
Congresswoman Dina Titus
Congresswoman Shelley Berkley
Bob Abbey, Director, Bureau of Land Management
Ron Wenker, State Director, Bureau of Land Management
Victoria Barr, Manager, Caliente BLM Field Office
Paul Mathews, Chairman, Lincoln County Commissioners
Jeff Fontaine, Nevada Association of Counties